



ATTACHMENT 35

AIRWORTHINESS GROUP CHAIRMAN'S FACTUAL REPORT

LAX-02-GA-201



United States Department of the Interior
OFFICE OF THE SECRETARY
OFFICE OF AIRCRAFT SERVICES

4343 Aircraft Drive
Anchorage, Alaska 99502-1052

Reply Refer To:
13A.1

March 26, 1992

MEMORANDUM

TO: DIRECTOR, OFFICE OF AIRCRAFT SERVICES, BOISE

FROM: REGIONAL DIRECTOR, ALASKA

SUBJECT: CERTIFICATION AND MAINTENANCE OF C-130A AIRCRAFT

The intent of this information paper is to identify inadequacies discovered in the certification, maintenance and use of Lockheed C-130A aircraft which causes us concern. We feel this concern may extend throughout the airtransporter industry in their C-130A aircraft operations. Our recent visit to T&G Aviation, Inc. revealed some information which we feel needs to be surfaced and addressed. These items are as follows:

1. C-130A, Serial No. 56-0478, was certificated under Type Certificate Data Sheet No. A15NM (Enclosure No. 1). This required that prior to civil airworthiness certification, compliance with all U.S. Air Force technical orders which affect airworthiness must be accomplished.
2. One of the requirements contained in the Air Force Technical Orders is for the aircraft to undergo a Programmed Depot Maintenance (PDM). This is a fairly significant event in the inspection and maintenance cycle of the aircraft and is required in accordance with Technical Order C-130A-0. The last PDM for this aircraft was on August 26, 1985 (total aircraft time 12,437 hours). The life or duration of this PDM is 42 months (Reference TO-00-2-4, Table 1-2, Enclosure 2).
3. On June 13, 1989, a PDM extension inspection was performed on the aircraft (total aircraft time: 13,967 hours). This extension inspection provided for another 180 days of operation prior to the requirement for the full PDM review. The extension extended the airworthiness of the aircraft through December 15, 1989.
4. The Federal Aviation Administration (FAA) issued an airworthiness certificate on February 8, 1990. The issuance of this airworthiness certificate appears to be in conflict with Note 6 of the Type Certificate Data Sheet which required compliance with all Technical Orders that affect airworthiness. This would include PDM.
5. Discussions with T&G on this matter have not revealed any disagreements with our findings. The matter was voluntarily surfaced during our

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meetings and nothing has been presented as of this date to refute these findings. It should also be noted that T&G stated that it had three other C-130A aircraft with similar circumstances.

The sequence of events would indicate that the aircraft was certificated by the Federal Aviation Administration (FAA) for civilian use after its military inspection program requirement had lapsed. Investigation into the military and FAA records indicate aircraft N130HP (Hawkins and Powers Aviation), and N531BA which are Forest Service carded airtankers, have the same problem. (See Enclosure No. 3.)

This is not our first exposure to the varying maintenance practices of these aircraft. The proposal submitted by Hawkins and Powers Aviation, Inc., under the multi-role solicitation was rejected based upon an incomplete maintenance program. This otherwise FAA-approved maintenance program did not provide for life-limited or calendar maintenance requirements including depot inspection and maintenance (PDM).

Our experience with the C-130A and the varying approaches to maintenance and the various FAA-approved programs leave us questioning the aircraft's current airworthiness. Our reviews have involved discussions with both military and civilian personnel knowledgeable in the operation of this aircraft. They advise us against using these aircraft without the proper inspections and maintenance being performed. This included the PDM, (depot level) inspection and maintenance as well as adherence to life-limited and/or calendar maintenance requirements. Along with the Alaska Fire Service we have elected not to renew T&G's contract during the Government's option period; therefore, averting a dispute.

Our concern manifests itself in whether the airtanker industry can furnish the Government the level of maintenance required for this type aircraft. Our findings in the cited examples leave us questioning the safety of our joint use of these aircraft.

The position of both Chiefs, Division of Technical Services, is that C-130A aircraft not be operated for the Department of the Interior (DOI) beyond an inspection, or component overhaul/replacement requirement identified in that aircraft's military maintenance program. The basis for their position is supported and shared by the U.S. Air Force's C-130 System Program Engineer from Robins Air Force Base. They advised against using these aircraft if beyond an inspection or maintenance requirement.

Large (over 12,500-pound maximum certified gross takeoff weight) aircraft are required by 14 CFR 91 to be maintained in accordance with an approved inspection program.

Due to the short time the C-130A has been available to civil users, it is inconceivable that any maintenance program should not parallel either Lockheed's L-382 or the military maintenance program both of which require PDM, D checks or in-depth type inspections.

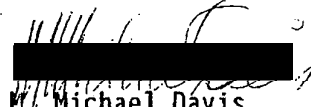
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In summary, three recommendations are offered:

1. Notify the FAA of our findings and solicit their assistance in resolving what would appear to be airworthiness problem. Their assistance should also focus in on the varying approaches to maintenance for this type aircraft and provide some standardization among operators.
2. The DOI's use of these C-130A aircraft should be based upon an inspection and maintenance program which incorporates all the inspection, life-limited component overhauls/replacement and maintenance requirements for continued airworthiness. This should be based either upon the Lockheed L-382 or the U.S. Air Force maintenance programs. Suggest similar requirements be required of all surplus military aircraft, such as the OV-10 and C-23.
3. Notify the U.S Forest Service of our findings and request that they support these recommendations.

If a presentation of this subject will facilitate a better understanding, let me know and I will be prepared to do so during our next Quarterly Review Analysis. If you have any questions, please let me know.


Michael Davis

Attachments